

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEBRASKA

JANE DOE,

Plaintiff,

vs.

BOARD OF REGENTS OF THE  
UNIVERSITY OF NEBRASKA; and  
individuals TAMIKO STRICKMAN and  
JOHN ROE, individually and in their  
official capacities; and OTHER  
UNIDENTIFIED DEFENDANTS;

Defendants.

Case No. 4:21-cv-03049

**JOINT MOTION TO EXTEND  
PROGRESSION ORDER DEADLINES**

COME NOW the Plaintiff, Jane Doe, and Defendants Board of Regents of the University of Nebraska and Tamiko Strickman ("Defendants") by and through their undersigned counsel, and pursuant to the Court's Civil Case Management Practices, hereby move the Court for an Order enlarging some of the Court's deadlines issued on December 15, 2022, in its Second Amended Case Progression Order *[Filing No. 58]* as follows:

1. The Defendants' deadline for filing Motions to Exclude Testimony on Daubert and related grounds be extended from August 15, 2023, to September 8, 2023.
2. The Defendants' deadline for filing dispositive motions be extended from August 15, 2023, to September 8, 2023.
3. The Defendants' deadline for filing motion to bifurcate be extended from August 15, 2023, to September 8, 2023.
4. The Plaintiff's deadline for filing a response to any Motions to Exclude Testimony on Daubert and related grounds, dispositive motions, and motion to bifurcate be set at November 3, 2023. No date was set for these responses in the prior case progression orders (ECF Nos. 31, 46, and 58). The Parties agree to extending the deadline for responses from the timelines set in Fed. R. Civ. P. 6 and Neb. Civ. R. 7.1 due to the number of

anticipated motions to be filed by Defendants on the same date and other deadlines already set in Plaintiffs' counsel's other cases.

5. The parties are working diligently to comply with all of the Court deadlines but need additional time to gather evidence and complete briefings. The enlargement of the time requested will not cause any undue hardship or prejudice to any party.

WHEREFORE, Plaintiff and Defendants respectfully request from this Court an extension of the deadlines as set forth herein.

Dated this 11th day of August, 2023.

JANE DOE, Plaintiff.

By: /s/ Karen Truszkowski  
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BOARD OF REGENTS OF THE  
UNIVERSITY OF NEBRASKA and  
TAMIKO STRICKMAN, Defendants.

By: /s/ Lily Amare  
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**CERTIFICATE OF SERVICE**

I hereby certify that on August 11, 2023, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all parties who have entered an appearance in this case as well as electronically transmitted.

/s/ Lily Amare  
Lily Amare